

**SUPPRESSED**

**FILED**

**MAY 24 2018**

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

ONA FREEMAN,

Defendant.

No.

**4:18CR00437 SNLJ/SPM**

**INDICTMENT – COUNT I**  
**WIRE FRAUD 18 U.S.C. 1343**

*Introduction*

1. At all relevant times, the Defendant One Freeman was a resident of Illinois.
2. At all relevant times, Von Maur was a department store headquartered in the State of Iowa with a store located in Lake St. Louis, Missouri which lies within the Eastern District of Missouri.
3. At all relevant times, Von Maur offered credit services to its customers. Customers wishing to apply for a line of credit for purchases at Von Maur stores could prepare a credit application in any store. The information, including name and social security account number would be transmitted from a particular store to the Von Maur headquarters in Iowa by means of wire communications. A decision on whether and how much credit should be extended to an applicant would then be transmitted by means of wire communication from Iowa to the Von Maur store from which the application was taken.

*The Lake St. Louis Incident*

4. On or about March 26, 2017, the Defendant traveled to the Lake St. Louis Von Maur department store in the Eastern District of Missouri and applied for a credit account with the store using the name and social security account number of T.S., an individual residing in the State of Minnesota. In the application, Defendant falsely represented herself to be T.S. and falsely promised to be responsible for charges made on the credit account issued in the name of T.S.
5. In reliance on Defendant's false, material representations, Von Maur extended a credit account in the name of T.S. controlled by Defendant. Defendant immediately purchased numerous items from the Von Maur store and departed.
6. T.S. did not authorize Defendant to apply for or use credit accounts taken out in the name of T.S. On March 25, 2017, fraudulent credit accounts in the name of T.S. were taken out at a Dillard's Department Store and a Kohl's department store in the State of Tennessee.

*The Offense Conduct*

7. On or about March 26, 2017, in the Eastern District of Missouri and elsewhere, the Defendant,

**ONA FREEMAN,**

having devised a scheme and artifice to defraud another of money and valuable property by means of false and fraudulent pretenses, representations or promises, did send and cause to be sent by means of wire, radio or television communication, signs, signals, writings, pictures or sounds in interstate and foreign commerce, to wit: the transmission of a false and fraudulent Von Maur credit application from the State of Missouri to the State of Iowa.

In violation of Title 18, United States Code Section 1343.

**COUNT II – Aggravated Identity Theft**

8. The allegations contained in Paragraphs 1 through 7 are hereby realleged and incorporated by reference.
9. On or about March 26, 2017, in the Eastern Distreict of Missouri and elsewhere, the Defendant,

**ONA FREEMAN,**

during and in relation to the Wire Fraud alleged in Count I, knowingly transferred, possessed and used without lawful authority the means of identification of t.S.

In violation of Title 18, United States Code Section 1028A(a)(1).

A TRUE BILL

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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Assistant United States Attorney